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C.C. JOHNSON & MALHOTRA, P.C.

MEMORANDUM

TO: Michael Towle

ORIGINAL (Red)

FROM: James A. Susan JAS (new)

DATE: April 5, 1988

PROJECT: EPA Contract No. 68-01-7403

SUBJECT: Keystone Sanitation Company Site
Public Meeting Responsiveness Summary

On March 29, 1988 a public meeting was held at the Littlestown High School to discuss the Draft Work Plan for the Keystone Sanitation Company Site. The purpose of the meeting was to present to the citizens of the area the current status of the project, the scope and methodology of the proposed work, and solicit concerns comments from the citizens.

EPA conducted the meeting and provided an overview of the Superfund process and a summary of the work to be performed as contained in the Draft Work Plan. Approximately 200 people attended the meeting. The meeting was orderly and all the people who wanted to speak were given the opportunity. The meeting ended at about 9:30 p.m. The following is a summary of community concerns.

- The possibility of contamination affecting the Littlestown and Hanover water supplies was not addressed in the work plan.
- The number of residences and number of potentially affected people within both a one mile radius and a three mile radius of the site should be verified.
- The contact between the Marburg Schist and the Antietam Formation has high angle fractures which crosscut the contact. Ground water can flow across the contact, and therefore, the contact should not be treated as a barrier to ground water migration.
- Only one data point (generated by Buchart-Horn) has been used to substantiate the claim that bedrock schistosity exerts a control on ground water flow. This should be verified.
- A fracture trace analysis is not a reliable indicator of the existence of fractures. Other methods of fracture detection must be used to site monitor wells. Suggested that surficial geophysical surveys using resistivity, very low frequency electromagnetometry, and siesmic be used. Several geophysical methods must be used, not just a single method. These surveys should start at the landfill boundary and work outward.

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- Inclined boreholes should be drilled to detect subvertical fractures.

- Some residential wells are greater than 400 feet deep, so all deep monitor wells should be over 400 feet deep.

- How will the work plan deal with horizontal variability of fractures?

- The RI/FS should clearly state that a phased approach will be used if contamination is found in the monitor wells farthest from the landfill.

- The real worst case scenario is that a layer of heavier-than-water chlorinated solvents are present at depth.

- The work plan states that the landfill uses clean soil to cover the filled material, but also states that no soil sampling has been done.

- How will the site investigation and remediation be affected if Keystone is granted a permit for a new landfill on the adjacent property? Does EPA have any policy regarding the expansion of a hazardous waste site, i.e. the landfill?

- Which residential wells will be sampled? If wells outside the scope of the investigation are contaminated with chemicals similar to those in the landfill wells, can these wells be tested? Are funds available for residents in the area who wish to have their wells tested if their wells will not be sampled as part of the remedial investigation?

- Communications between EPA and citizens need to be improved. Union Township and the citizens groups want representatives at EPA meetings and want to be notified of correspondence and documents which pertain to the site as soon as these items are developed or distributed.

- Concern over the length of time required for the investigation and cleanup (approximately 2 years to complete the RI/FS).

- Keystone is still allowing dumping at the landfill. The Fact Sheet statement that the landfill is operating "in conformance with state regulations" is disputed.

- What is the current health risk? The statement that there is no immediate health risk is not true because the routes of contaminant migration and levels of contamination are not known.

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- What is actually in the landfill? The high levels of metals in the landfill data are alarming. The metals won't be affected by the spray system at Keystone's monitor well No. 1. How are these treated?

- The spray system at monitor well No. 1 is an "irrigation" system, not an "aeration" system.

- "Low levels" of contaminants is not a good term because there is nothing to compare the levels to, and levels of some contaminants at the landfill are above drinking water standards.

- Removal of the landfill material is the only acceptable solution to the problem.

- All EPA's work is "intertwined" with the Consent Adjudication between Keystone and Pennsylvania Department of Environmental Resources.

- EPA is using Buchart-Horn's on-site data and these data are not reliable.

- The deadline for comments should be extended because the work plan contains a large volume of technical material, and additional time is needed to review this data.

cc: J. Tucker, WRJ, PMO
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File 804-0110

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